

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

- against -

NOTICE OF MOTION

ALEXEI SAAB,

19 cr. 676 (PGG)

Defendant.

-----X

PLEASE TAKE NOTICE that the defendant ALEXEI SAAB will move this Court before the Honorable Paul G. Gardephe, United States District Judge, Southern District of New York in the Thurgood Marshall Courthouse, 40 Foley Square New York, New York on a date and time convenient to the Court, for an Order granting the following relief:

- (1) For an Order granting bail or in the alternative for a detention hearing.
- (2) For an Order compelling the Government to declassify certain information to the defense.
- (3) For an Order permitting the defendant to make such other and further motions as may be appropriate; and
- (4) For such other and further relief as to this Court may seem just and proper.

Dated: May 24, 2021
New York, New York

Yours, etc.

s/Esere Onaodowan
ONADOWAN & DELINCE
Associate Counsel for
ALEXEI SAAB

s/Marlon G. Kirton
KIRTON LAW FIRM
Attorney for Defendant
ALEXEI SAAB

116 W. 23rd Street, 5th Floor
New York, N.Y. 10011
(646) 375-2119 ph
(646) 677-6918 fax
enaodowan@eocdlaw.com email

175 Fulton Avenue, Suite 305
Hempstead, New York 1550
(516) 833-5617 ph
(516) 833-5620 fax
kirtonlawfirm@gmail.com email

TO:

Hon. Paul G. Gardephe
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

Jason Richman and Jessica Fender
Assistant United States Attorneys
United States Attorney
Southern District of New York
Silvio J. Mollo Building
One Saint Andrews Plaza
New York, New York 10007

MR. ALEXEI SAAB